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3 CLERK U.S. DISTRICT COURT
4 CENTRAL DIST. OF CALIF.
5 LOS ANGELES
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BY _____

8 UNITED STATES DISTRICT COURT

9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 June 2017 Grand Jury

11 UNITED STATES OF AMERICA,

SA CR No. 17-76

12 Plaintiff,

I N D I C T M E N T

13 v.

14 JEFFREY OLSEN,

[21 U.S.C. §§ 841(a)(1),
(b) (1) (C), (b)(1)(E), and
(b) (2): Distribution of
Oxycodone, Amphetamine Salts,
Alprazolam, and Hydrocodone; 21
U.S.C. § 843(a)(4)(A): False
Statement in a DEA Registration
Application; 21 U.S.C. § 853:
Criminal Forfeiture]

15 Defendant.

19 The Grand Jury charges:

20 COUNTS ONE through NINETEEN

21 [21 U.S.C. §§ 841(a)(1), (b) (1) (C)]

22 On or about the following dates, in Orange County, within
23 the Central District of California, and elsewhere, defendant
24 JEFFREY OLSEN, then a physician licensed to practice medicine in
25 the State of California, while acting and intending to act
26 outside the usual course of professional practice and without a
27 legitimate medical purpose, knowingly and intentionally

1 prescribed and distributed oxycodone, a Schedule II narcotic
 2 drug controlled substance, to the following persons:

COUNT	DATE	NAMED RECIPIENT
ONE	August 2, 2013	K.K.
TWO	August 9, 2013	J.G.
THREE	September 9, 2013	K.K.
FOUR	October 1, 2013	J.G.
FIVE	October 12, 2013	J.V.
SIX	April 9, 2014	J.G.
SEVEN	May 14, 2014	J.G.
EIGHT	May 16, 2014	J.V.
NINE	February 13, 2015	K.B.
TEN	March 9, 2015	K.B.
ELEVEN	April 9, 2015	K.B.
TWELVE	April 9, 2015	J.W.
THIRTEEN	April 17, 2015	K.B.
FOURTEEN	April 28, 2015	J.W.
FIFTEEN	May 18, 2015	J.G.
SIXTEEN	May 18, 2015	J.V.
SEVENTEEN	June 25, 2015	J.G.
EIGHTEEN	June 25, 2015	J.V.
NINETEEN	January 20, 2016	J.W.

1 COUNTS TWENTY through TWENTY-FIVE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 On or about the following dates, in Orange County, within
4 the Central District of California, defendant JEFFREY OLSEN,
5 then a physician licensed to practice medicine in the State of
6 California, while acting and intending to act outside the usual
7 course of professional practice and without a legitimate medical
8 purpose, knowingly and intentionally prescribed and distributed
9 amphetamine salts, a Schedule II controlled substance, to the
10 following persons:

COUNT	DATE	NAMED RECIPIENT
TWENTY	March 9, 2015	K.B.
TWENTY-ONE	April 9, 2015	K.B.
TWENTY-TWO	April 9, 2015	J.W.
TWENTY-THREE	April 17, 2015	K.B.
TWENTY-FOUR	April 28, 2015	J.W.
TWENTY-FIVE	January 20, 2016	J.W.

1 COUNTS TWENTY-SIX through THIRTY-TWO

2 [21 U.S.C. §§ 841(a)(1), (b)(2)]

3 On or about the following dates, in Orange County, within
4 the Central District of California, defendant JEFFREY OLSEN,
5 then a physician licensed to practice medicine in the State of
6 California, while acting and intending to act outside the usual
7 course of professional practice and without a legitimate medical
8 purpose, knowingly and intentionally prescribed and distributed
9 alprazolam, a Schedule IV controlled substance, to the following
10 persons:

COUNT	DATE	RECIPIENT
TWENTY-SIX	February 13, 2015	K.B.
TWENTY-SEVEN	March 9, 2015	K.B.
TWENTY-EIGHT	April 9, 2015	K.B.
TWENTY-NINE	April 9, 2015	J.W.
THIRTY	April 17, 2015	K.B.
THIRTY-ONE	April 28, 2015	J.W.
THIRTY-TWO	January 20, 2016	J.W.

1 COUNTS THIRTY-THREE and THIRTY-FOUR

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(E)]

3 On or about the following dates, in Los Angeles County,
4 within the Central District of California, defendant JEFFREY
5 OLSEN, then a physician licensed to practice medicine in the
6 State of California, while acting and intending to act outside
7 the usual course of professional practice and without a
8 legitimate medical purpose, knowingly and intentionally
9 prescribed and distributed hydrocodone, then a Schedule III
10 narcotic drug controlled substance, to the following person:

COUNT	DATE	NAMED RECIPIENT
THIRTY-THREE	August 29, 2013	S.K.
THIRTY-FOUR	September 24, 2013	S.K.

1 COUNT THIRTY-FIVE

2 [21 U.S.C. § 843(a)(4)(A)]

3 On or about May 20, 2016, in Orange County, within the
4 Central District of California, defendant JEFFREY OLSEN
5 ("OLSEN") knowingly and intentionally furnished false and
6 fraudulent material information in an application required to be
7 filed under Title 21, United States Code, Section 823, and Title
8 21, Code of Federal Regulations, Part 1301, in that defendant
9 OLSEN submitted to the United States Drug Enforcement
10 Administration ("DEA") an application to obtain a federal
11 controlled substance registration stating that defendant OLSEN
12 had never had a federal controlled substance registration
13 revoked, suspended, restricted or denied, when, in truth and in
14 fact, as defendant OLSEN then well knew, effective on or about
15 March 18, 2016, the DEA suspended defendant OLSEN's federal
16 controlled substance registration.

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1 FORFEITURE ALLEGATION

2 [21 U.S.C. § 853]

3 1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is
4 hereby given to defendant JEFFREY OLSEN ("defendant") that the
5 United States will seek forfeiture as part of any sentence in
6 accordance with Title 21, United States Code, Section 853, in
7 the event of defendant's conviction under any of Counts One
8 through Thirty-Four of this Indictment.

9 2. Upon such conviction, defendant shall forfeit to the
10 United States the following property:

11 a. all right, title, and interest in any and all
12 property, real or personal:

13 (i) constituting, or derived from, any proceeds
14 obtained, directly or indirectly, as a result of any offense of
15 conviction;

16 (ii) used, or intended to be used, in any manner or
17 part, to commit, or to facilitate the commission of any such
18 offense; and

19 b. To the extent such property is not available for
20 forfeiture, a sum of money equal to the total value of the
21 property described in paragraph 2.a.

22 3. Pursuant to Title 21, United States Code, Section
23 853(p), defendant shall forfeit substitute property, up to the
24 value of the total amount described in paragraph 2, if, as the
25 result of any act or omission of defendant, the property
26 described in paragraph 2, or any portion thereof (a) cannot be
27 located upon the exercise of due diligence; (b) has been
28 transferred, sold to, or deposited with a third party; (c) has

1 been placed beyond the jurisdiction of the court; (d) has been
2 substantially diminished in value; or (e) has been commingled
3 with other property that cannot be divided without difficulty.

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6 A TRUE BILL

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Foreperson

10 SANDRA R. BROWN
11 Acting United States Attorney



13 LAWRENCE S. MIDDLETON
14 Assistant United States Attorney
Chief, Criminal Division

15 KEVIN M. LALLY
16 Assistant United States Attorney
Chief, Organized Crime Drug Enforcement
Task Force Section

17 BENJAMIN R. BARRON
18 Assistant United States Attorney
Deputy Chief, Organized Crime Drug
Enforcement Task Force Section

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